

EXHIBIT 6

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 -----X
5 IN RE GOOGLE PLAY STORE ANTITRUST
6 LITIGATION

7 Case No. 3:21-md-02981-JD

8 THIS DOCUMENT RELATES TO:

9 Epic Games Inc. V. Google LLC, et al.
10 Case No.: 3:20-cv-05671-JD

11 In re Google Play Consumer Antitrust
12 Litigation
13 Case No.: 3:20-cv-05761-JD

14 In re Google Play Developer Antitrust
15 Litigation
16 Case No.: 3:20-cv-05792-JD

17 State of Utah, et al. V. Google LLC,
18 et al.

19 Case No.: 3:21-cv-05227-JD

20 -----X

21 ** HIGHLY CONFIDENTIAL **
22 REMOTE VIDEOTAPED DEPOSITION OF
23 MICHAEL ALAN WILLIAMS, Ph.D.
24 May 11, 2022
25 8:13 a.m.

Reported By:
Maureen Ratto, RPR, CCR

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2 subscriptions and in-app content on
3 Google Play?

4 A. Yes, sir.

5 Q. What is that opinion?

6 A. That the vast majority of the
7 app prices wouldn't change and, in
8 particular, the percentage of developers
9 that have at least one product
10 monetization type combination, again,
11 that's what Dr. Burtis called a SKU, and
12 I'm wishing I had, to save space here,
13 that the percentage of developers that
14 have at least one product monetization
15 type combination with a passthrough rate
16 of less than 100% is -- is about 99%.

17 So it's just extremely rare
18 for developers to have really any
19 positive passthrough rate, much less one
20 at 100% or higher.

21 Q. So, again, if we assume that
22 Google would have charged a lower service
23 fee, but for its alleged conduct, do you
24 have an opinion about whether consumers
25 generally would have paid lower prices

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2 for app subscriptions and in-app content
3 on Google Play?

4 A. Yes, sir.

5 Q. What is that opinion?

6 A. They would not have. The
7 passthrough rates for the vast majority
8 of instances are zero.

9 Q. How confident are you in that
10 opinion?

11 A. I'm extremely confident. I've
12 looked at every single instance in which
13 there was a change in a service fee.
14 That's what's in figure 3. I've done a
15 difference-in-difference analysis that
16 I'm very confident in. So I'd say I'm
17 very confident.

18 I would also note that I
19 believe Dr. Burtis is largely in
20 agreement with me. Her report contains an
21 analysis that's like the first one I did.
22 Although, she actually was able to find
23 some data that I didn't have and if I
24 recall correctly, I believe she concluded
25 that 98% of the SKUs that she examined

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2 had a zero passthrough rate.

3 Q. To your knowledge, has any
4 other Plaintiffs' expert in this case
5 evaluated passthrough?

6 A. Yes.

7 Q. Who?

8 A. Dr. Singer has a passthrough
9 analysis in his opening report.

10 Q. Do you have an understanding
11 as to which party retained Dr. Singer as
12 an expert?

13 A. I believe it's the proposed
14 Consumer Class.

15 Q. Have you reviewed Dr. Singer's
16 passthrough analyses?

17 A. From his opening report I
18 have, yes. I have not reviewed what he
19 may or may not have said in his reply
20 report.

21 Q. And in your understanding,
22 what does Dr. Singer purport to find with
23 respect to passthrough?

24 A. I believe he finds passthrough
25 rates on the order of 99% for -- I think

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2 He says he does but then he throws it
3 away.

4 Q. What do you mean that "he
5 throws it away"?

6 A. Well, he doesn't actually use
7 it. He talks about it, he has a logit --
8 a bunch of logit demand elasticity that
9 in my opinion are all wrong anyway, but
10 then he throws that analysis away when he
11 actually calculates the passthrough
12 rates. And he says the passthrough rates
13 are simply one minus the shares of those
14 38 categories he got from Google.

15 Q. Do you believe that is a
16 reliable methodology for evaluating
17 passthrough?

18 A. I do not.

19 Q. Why not?

20 A. I don't believe the -- I don't
21 believe the logit analysis -- I don't
22 believe the way that the products are
23 aggregated has anything to do with any
24 antitrust markets. I don't believe the
25 passthrough rates are in fact '99% in the

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2 actual world or the but-for world.

3 These -- these passthrough
4 rates of his are a complete, in my
5 opinion, complete fictions based on 38
6 totally ad hoc groupings of products that
7 he got -- based on a document that he got
8 from Google. He doesn't look at any
9 actual data in the real world to think
10 about what the passthrough rates really
11 look like. It defies common sense if you
12 actually look -- forget about
13 regressions, forget about what Dr. Burtis
14 and I did in our examination of product
15 -- of changes in product prices as it
16 followed changes in service fees. Just
17 look at the actual app prices. They
18 almost never changed and that makes sense
19 if you think about it. Why would they
20 change them? Their costs are completely
21 sunk. The marginal costs are basically
22 zero. They just don't change these prices
23 very often. So when they get a change in
24 the service fee they don't -- it just
25 doesn't cause them to change their

C E R T I F I C A T E

I, MAUREEN M. RATTO, a
Registered Professional Reporter, do
hereby certify that prior to the
commencement of the examination,
MICHAEL ALAN WILLIAMS, Ph.D. was sworn
by me to testify the truth, the whole
truth and nothing but the truth.

I DO FURTHER CERTIFY that the
foregoing is a true and accurate
transcript of the proceedings as taken
stenographically by and before me at
the time, place and on the date
hereinbefore set forth.

I DO FURTHER CERTIFY that I am
neither a relative nor employee nor
attorney nor counsel of any of the
parties to this action, and that I am
neither a relative nor employee of such
attorney or counsel, and that I am not
financially interested in this action.



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